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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
No. 04-CV-10699-RCL

STEVEN RAMSEY, *
Plaintiff, *
v. *
JAY CASHMAN, INCORPORATED, *
Defendant. *

DEPOSITION of STEVEN R. RAMSEY, a
witness called on behalf of the Defendant,
pursuant to the applicable provisions of the
Federal Rules of Civil Procedure, before
CATHERINE L. ZELINSKI, a Certified Shorthand
Reporter and Notary Public, in and for the
Commonwealth of Massachusetts, at the Law
offices of Holbrook and Murphy, 150 Federal
Street, Boston, Massachusetts, on Wednesday,
October 20, 2004, commencing at 12:00 p.m.

REPORTERS, INC.
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1 Q. So when you left with the safety man on the
2 skiff, had you already received the radio
3 message about the parts?

4 A. I hadn't, Kenny King had. As I said, that's
5 what he told me he had. He had received.

6 Q. And he just kind of missed you?

7 A. No, he told me he was going to be getting --
8 they weren't there yet. He was getting parts
9 in, so when he comes to the shore, go over
10 and get the parts. And I said, no problem.
11 And I kept doing what I was doing.

12 Q. So let me just back up a bit then.

13 You had been at this particular job
14 site for months before you got hurt?

15 A. Yeah, a couple of months anyway, yeah.

16 Q. How often did you use the skiff before you
17 got hurt?

18 A. Everyday. A couple of times a day.

19 Q. Before the time that you got hurt, did you
20 have any problem or complaint with the skiff?

21 A. Not me. It had sunk twice. But not by me.
22 It was left on the dock and they left it over
23 the weekend and it had rained and it filled
24 up and it sank.